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Attorneys for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE NEW JERSEY TAX SALES
CERTIFICATES ANTITRUST LITIG.

Master Docket No. 3:12-CV-01893-MAS-TJB

**NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENTS WITH NORMAN T.
REMICK, AMERICAN TAX FUNDING,
ROBERT W. STEIN, AND LAMBROS
XETHALIS, PRELIMINARY
CERTIFICATION OF SETTLEMENT
CLASS, APPOINTMENT OF INTERIM
CLASS COUNSEL AND LIAISON
COUSNEL AS SETTLEMENT CLASS
COUSNEL, AND APPROVAL OF CLASS
NOTICE**

TO: ALL COUNSEL IN THE CAPTIONED MATTER

PLEASE TAKE NOTICE that on July 21, 2014 at 9:00 a.m., or as soon thereafter as counsel may be heard, Plaintiffs will move before the Honorable Michael A. Shipp, U.S.D.J., at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for an order granting preliminary approval of settlements with defendants Norman T. Remick, American Tax Funding, LLC, Robert Stein, and Lambros Xethalis, preliminary certification of settlement class,

appointment of Interim Class Counsel and Liaison as Settlement Class Counsel, and approval of class notice.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs will rely upon the accompanying Memorandum of Law and Declaration of Seth Gassman, with attached exhibits. A proposed form of Order is also submitted herewith.

Dated: June 27, 2013

LITE DEPALMA GREENBERG, LLC

/s/ Bruce D. Greenberg

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